

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS**

IN RE APPLICATION FOR AN ORDER) CASE NO.: _____
PURSUANT TO 28 U.S.C. § 1782 TO OBTAIN)
DISCOVERY FOR USE IN FOREIGN)
PROCEEDINGS

**DECLARATION OF RANDAL MILLER IN SUPPORT *EX PARTE* APPLICATION OF
MALIKIE INNOVATIONS, LTD. AND KEY PATENT INNOVATIONS, LTD. FOR AN
ORDER PURSUANT TO 28 U.S.C. § 1782 TO OBTAIN DISCOVERY FOR USE IN
FOREIGN PROCEEDINGS**

I, Randal C. Miller, declare as follows.

1. I am an attorney at Wilson Sonsini Goodrich & Rosati, counsel of record for Applicants Malikie Innovations, Ltd., (“Malikie Innovations”) and Key Patent Innovations, Ltd. (“KPI”) (collectively “Malikie”). I am admitted to practice law in California and Washington. I have personal knowledge of the facts set forth herein, and, if called as a witness, I could and would testify competently hereto.

2. I am submitting this declaration on behalf of Malikie in support of its *Ex Parte* Application for an Order Pursuant to 28 U.S.C. § 1782 to Obtain Discovery for use in Foreign Proceedings.

3. Attached hereto as Exhibit 1 is a true and correct copy of the proposed Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action, that Malikie seeks to serve on BlackBerry Corp. (which, together with its parent company BlackBerry Ltd., shall be referred to hereafter as “BlackBerry”).

4. Attached hereto as Exhibit 2 is a true and correct copy of the Protective Order that Malikie will propose to BlackBerry. Malikie will work with BlackBerry on any necessary revisions, and when the parties have stipulated upon a joint proposed Protective Order, Malikie will submit it to the Court.


5. Attached hereto as Exhibit 3 is a true and correct excerpted copy of the Annual Report Pursuant to Section 13(a) or 15(d) of the Securities Exchange Act of 1934 for BlackBerry Ltd., for the fiscal year ending February 28, 2018.

6. Attached hereto as Exhibit 4 is a true and correct copy of BlackBerry’s website listing its office locations, including at 7950 Legacy Drive, Suite 400, Plano, TX 75024. The website URL is <https://www.blackberry.com/us/en/company/blackberry-office-locations> and I

made this copy on July 10, 2025. I understand from communications with BlackBerry representatives that this is BlackBerry Corp.'s headquarters and principal place of business.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed in Issaquah, WA on July 22, 2025.

By:  _____
Randal Miller